

From: "Kirk E. Willyard" <kwillyard@firstbank.com> on 04/11/2006 11:55:04 AM

Subject: Commercial Real Estate Lending

Gentlemen,

As an opposer of the above mentioned proposal, I have a few points and reminders I would like to make regarding such.

1. First is my opposition to the proposed regulation
2. This is regulatory overkill and will hurt real estate lending causing an artificial real estate recession
3. May I remind the Fed that before imposing regulations across the board that they should first "regulate banks that are making risky loans before imposing penalties on the entire industry."
4. This regulation will push Banks into making unsecured loans to get around the regulation and thus put the industry at greater risk.
5. May I remind the FED that the regulatory over reaction to the S&L crisis in the late 1980's and early 1990's in hindsight caused unneeded harm. Do not make the same mistake again.

Sincerely,

Kirk E. Willyard
Loan Representative

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